



KAISER • HILL
COMPANY



INTEROFFICE MEMORANDUM

DATE: April 28, 1997
TO: M. E. Hickman, RMRS Eng., Const., and Decommissioning, T130F, X7145
FROM: S. M. Nesta, C&PA, National Environmental Policy Act, T130C, X6386 *smnests*
SUBJECT: NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION IN
THE BUILDINGS 980, 968 AND 965 DEMOLITION PROPOSED ACTION
MEMORANDUM (PAM) - SMN-104-97

We have reviewed the April 23, 1997 draft PAM for the subject project. We particularly took note of the fact that the material necessary to make the document compliant with NEPA, material which I transmitted to you and to Kent Dorr in my memorandum of March 19, 1997, is not included in the PAM. Until that material, or something similar, is part of the PAM, the PAM is not in compliance with NEPA. For your convience, I attach a copy of my earlier memomadum.

In addition to reviewing the document for compliance with NEPA, I have made the draft PAM available for review by other compliance specialists in the Compliance and Performance Assurance Group. Because of the extremely short review time, I have requested that those comments be submitted directly to you by noon of May 1.

Please do not hesitate to contact me at X6386 or Bill Moore of Labat Anderson/NEPA at X8132 if you have any questions or need additional information.

Attachment: As Stated

cc:
K. North, K-H
R. C. Nininger, K-H
K. A. Dorr, K-H
file

ADMIN RECORD

B980-A-00014



KAISER • HILL
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INTEROFFICE MEMORANDUM

DATE: March 19, 1997
TO: K. A. Dorr, K-H, ERWM&I Operations, T130F, X6034
FROM: S. M. Nesta, C&PA, National Environmental Policy Act, T130C, X6386 *SM Nesta*
SUBJECT: NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DOCUMENTATION FOR
DECOMMISSIONING OF BUILDINGS 980, 968 AND 965 - SMN-060-97

I have received an environmental checklist submitted by Mark Hickman of RMRS for decommissioning of Buildings 980, 968 and 965. Under the terms of the Rocky Flats Cleanup Agreement, decommissioning is a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activity. CERCLA activities are not subject to a separate NEPA review; rather, they are to incorporate NEPA values in the relevant decision document. The relevant decision document for building decommissioning is the *Decommissioning Program Plan (DPP)*. The DPP, now in draft stage, is expected to be distributed for review by the public and regulatory agencies later this spring and be final in late summer or early fall. If the DPP were final, decommissioning of the three buildings would receive NEPA coverage from the NEPA values material that is part of that document.

We understand, however, that decommissioning of the three buildings is planned to proceed before the DPP is expected to be final. Our recommendation, therefore, is that NEPA compliance for this project can be best accomplished by incorporating the NEPA values material from the DPP by reference in the Proposed Action Memorandum. To that end, we suggest that section 4.0, Environmental Impacts, of the PAM be changed to read as follows:

4.0 National Environmental Policy Act Compliance

Compliance with the National Environmental Policy Act (NEPA) for CERCLA activities such a decommissioning of buildings is achieved by including consideration of NEPA values in the CERCLA decision document for the activity. This PAM is the CERCLA decision document for decommissioning of Building 980, 968, and 965. The appropriate NEPA values for decommissioning of Buildings 980, 968, and 965 are the same as those appropriate to decommissioning of other buildings at the Site. These are described and considered in the draft *Decommissioning Program Plan*, an early draft of which is currently in review by RFFO. This PAM includes by reference the NEPA values section (currently section 6.3) of the *Decommissioning Program Plan*. The expected environmental effects of decommissioning Buildings 908, 968, and 965 are encompassed within the environmental effects described in that document.

I attach a copy of the most recent version of the NEPA values narrative we prepared for the DPP. It has been updated from the material in the January 14 version of the DPP. You may wish to consider appending this narrative to the PAM, though we suggest taking advantage of the increased flexibility allowed by simply incorporating it by reference, since it may be revised again prior to the DPP becoming final.

K. A. Dorr
SMN-060-97
March 19, 1997
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Please do not hesitate to contact me at X6386, or Bill Moore of Labat Anderson/ NEPA at X8132 if you have any questions or need more information.

Attachment: As Stated

cc:
K. North, K-H
K. M. Lavorato, K-H
M. E. Hickman, RMRS
